

# United States District Court For the District of

215 Burlington Rd. S  
Bridgeton, N.J 08302  
Present-He Confined

New Jersey

CLERK  
U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
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2025 MAY 20 A 10:40

Charles Gilbert  
Plaintiff

Respondent

South Woods State Prison  
New Jersey Dept of Corrections

Dear, Clerk

Supreme Court of New Jersey

Docket #

Law Div #

Affidavit of Probable  
Cause and Assignment  
of Counsel

1. Now here comes before this honorable New Jersey Supreme Court, a prose plaintiff presenting an affidavit of Probable Cause, for reasons stated here in as a interlocutory manner initiated as a direct proximate result of deliberate indifference a product of rogue patterns upon knowledge and belief before this Court.
2. The use of isolated confinement in this states correctional facilities should be restricted to ensure the safe and humane operation of these facilities
3. The Isolated Confinement restriction act 30:4-82.5 consistent with the New Jersey constitution, the laws and public policies of this state, the mission of the correctional system, evolving medical knowledge and human rights standards of decency
4. 30:4-82.5 The standards established in this act should apply to all persons detained in correctional facilities under the jurisdiction of this state or any subdivision, regardless of the Civil or Criminal nature of the charges against them
5. The Due process clause of the 5<sup>th</sup> and 14<sup>th</sup> Amendment is the touchstone of protections from arbitrary actions of govern-

12. As a direct proximate result of this violation shows that it is sufficiently atypical and insignificant and that the demotion to these severe deprivations of liberty requiring due process under the rule of *Sendin v. Conner*

13. Inmate has been deprived of 1<sup>st</sup> Amendment right to both communicate with non prisoners via telephone and in addition the known deprivation denies access to plaintiffs right to Counsel, intimate association and other interest.

14. As a direct proximate result its arbitrary, complete ban unduly harsh and primitive described as punitive in its totality interrupting family ties, to and connection to the outside world presents a triable claim also effecting rehabilitation

15. As a direct proximate result of being held incommunicado inflicts pain, mental anguish and intentional infliction of emotional distress as there is a substantial liberty interest not to be held under these conditions denying equal protections of the law, 1<sup>st</sup> Amendment rights and other fundamental rights that should not be impeded upon

16. In total there is no psychological justification as the reason I am subject to disciplinary charges for allegations the officer mistakenly wrote a statement that is in contradiction to the video evidence that should be relied on

As a result of the allegations within Violations of Constitutional rights, I assert these are true and pursuant to 28 U.S.C 1946 I declare, verify and certify under penalty of perjury that the foregoing is true  
 Executed on this day 5/10/25  
 42 U.S.C 1983

1/1 C. M. Lee  
 PROSE

CC, file

Charles Gilbert # 07046601  
215 Burlington Rd  
Bridgeton, NJ 08302  
Monthly Confined

Joseph Mail  
5/10/25

CLERK  
U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
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Clerk of the Court  
Bridgeton dothas King Jr Building & Court House  
50 Walnut St  
Newark, NJ 07102

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